

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

INNOVATIVE GLOBAL SYSTEMS LLC,

Plaintiff,

v.

VOLVO CONSTRUCTION EQUIPMENT
NORTH AMERICA, INC., VOLVO
TRUCKS NORTH AMERICA, INC.,
KOMATSU AMERICA CORP.,
CATERPILLAR, INC., HYUNDAI
CONSTRUCTION EQUIPMENT
AMERICAS, INC., TOPCON TIERRA,
STARTRAK SYSTEMS, LLC, WIRELESS
MATRIX USA, LLC, JLG INDUSTRIES
INC., TYLER TECHNOLOGIES, INC.,
GEOTAB, INC., and NAVISTAR, INC.,

Defendants.

KOMATSU AMERICA CORP.,

Counterclaim Plaintiff,

v.

INNOVATIVE GLOBAL SYSTEMS LLC,

Counterclaim Defendant.

Civil No. 6:10-CV-00327-LED

JURY TRIAL DEMANDED

**DEFENDANT/COUNTER-PLAINTIFF KOMATSU AMERICA
CORPORATION'S RULE 7.1 DISCLOSURE STATEMENT**

Pursuant to Fed. R. Civ. P. 7.1, the following disclosure is made on behalf of
Defendant and Counterclaim Plaintiff Komatsu America Corp. ("Komatsu"):

Komatsu is a wholly owned subsidiary of Komatsu Ltd., a publicly traded
Japanese corporation. Komatsu is not aware of any publicly held corporation that
beneficially owns 10% or more of the stock of Komatsu Ltd.

Dated: September 9, 2010

Respectfully submitted,

FISH & RICHARDSON P.C.

/s/ Ruffin B. Cordell

Ruffin B. Cordell (Texas Bar # 04820550)

cordell@fr.com

James A. Fussell (SBN 2003193)

fussell@fr.com

FISH & RICHARDSON P.C.

1425 K Street, N.W., Suite 1100

Washington, D.C. 20005

Telephone: (202) 783-5070

Facsimile: (202) 783-2331

Ann Cathcart Chaplin (SBN 0284865)

(*admitted pro hac vice*)

cathcartchaplin@fr.com

FISH & RICHARDSON P.C.

60 South Sixth Street

3200 RBC Plaza

Minneapolis, MN 55402

Telephone: (612) 335-5070

Facsimile: (612) 288-9696

*Attorneys for Defendant/Counterclaim
Plaintiff Komatsu America Corp.*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document was served by e-mail via the Eastern District of Texas ECF System to all counsel of record on September 9, 2010.

/s/ Ruffin B. Cordell
Ruffin B. Cordell

60661142.doc